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July 14, 2025

## MEMO ENDORSED

**VIA ECF**

Hon. Edgardo Ramos, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The application is  granted  
 denied

A handwritten signature in blue ink that appears to read "Edgardo D. Ramos".

Edgardo Ramos, U.S.D.J  
Dated: July 15, 2025  
New York, New York

Dear Judge Ramos:

We represent Defendants in the above-referenced matter. We write jointly with Plaintiffs' counsel to request that all submission deadlines relating to Plaintiffs' Motion for Class Certification (Dkt. Nos. 235 et seq.) be stayed pending the results of a mediation that the parties have just agreed to engage in.

The parties have agreed to engage in private class-wide mediation with Martin Scheinman, Esq. in an attempt to resolve this matter prior to expending further resources engaging in motion practice. The mediation has been confirmed for October 14, 2025. The date selected is the earliest date in which all attorneys and clients are available on the four dates provided by Mr. Scheinman's office. As such, the parties request that all pending motion deadlines, including the submission of an opposition and reply brief due on July 25, 2025 and August 8, 2025, respectively, be stayed pending the results of the mediation. If the parties' request is granted, we will provide the Court with a status update within 14 days of completion of the mediation, and the parties shall submit their opposition and reply briefs to the class motion by November 17, 2025 and December 1, 2025 respectively if mediation is unsuccessful.

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We thank the Court for its time and attention to this matter.

Respectfully,

*/s/ Peter T. Shapiro*

Peter T. Shapiro of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

*/s/ C.K. Lee*

C.K. LEE of  
LEE LITIGATION GROUP PLLC

cc: All counsel of record (via ECF)